

Exhibit 1

From: Corey Stern
To: Devine, Alaina N.
Cc: Dupre, Kristin M.; Alyza M. Dermody; abourke@bernlip.com; arosenman@mayerbrown.com; BettenhausenM@michigan.gov; adeich@cohenmilstein.com; ahuller@hmelegal.com; akresch@1800lawfirm.com; andrew@aboodlaw.com; anlyn.addis@gmail.com; Ringstad, Andreas; Ashley.P.Vieux@bergf@butzel.com; betsyllewis@gmail.com; bgoodman@goodmanhurwitz.com; bmacdonald@ccglawyers.com; McElvaine, Bryan D.; brivers@pittlawpc.com; bwolf718@msn.com; carrie@aboodlaw.com; CavanaghC2@michigan.gov; cbechill@pittlawpc.com; cclare@clarkhill.com; Fletcher, Christopher D.; ckern@bernrpka.com; cmarker@owdpc.com; cmcgehee@pittlawpc.com; Oliveira, Christine E.; cplummer@bernlip.com; Renaud, Chrissie A.; crobins@bernlip.com; crobinson@pittlawpc.com; csego@maddinhauser.com; cstritmatter@sfplaw.com; cynthia@cmlindseylaw.com; d.dawson@fiegenerlaw.com; dana@owdpc.com; Daniel.c.eagles@usdoj.gov; david.kent@dbb.com; david.kent@faegredrinker.com; david.shea@sadplaw.com; davidj@butzel.com; Mason, Wayne B.; dcitigationdocketing@blankrome.com; dcoveart@fraserlawfirm.com; deblabelle@aol.com; devine@butzel.com; dqjonaj@weitzlux.com; DGreenspan@blankrome.com; dhart@maddinhauser.com; Donald.campbell@ceflawyers.com; eberezofsky@motleyrice.com; efilings@cohenmilstein.com; elevens@cohenmilstein.com; enaylor@ccglawyers.com; eric.a.rey@usdoj.gov; erin.sofinowski@murphyfalcon.com; eschaktman@bernlip.com; fajenlaw@fajenmiller.com; fletcher@loystlaw.com; frank.bednarz@hlli.org; gambilln@michigan.gov; g.fieger@fiegenerlaw.com; gibsonj16@michigan.gov; gmeihn@grsm.com; gstamatopoulos@weitzlux.com; hammoudfl@michigan.gov; haslawpc@gmail.com; hassan.murphy@murphyfalcon.com; haynes@butzel.com; heather@loevy.com; hfonseca@motleyrice.com; HiarR@michigan.gov; Hunter@nsprlaw.com; jahmy.graham@nelsonmullins.com; jamesallen@allenbrotherspllc.com; jamesmasonlaw27@gmail.com; jcappelli@bernlip.com; jconnors@susmangodfrey.com; jdolan@susmangodfrey.com; jebake@mcaldpinepc.com; jgalvin@gcdcwws.com; Jaimy Hamburg; jhurwitz@goodmanhurwitz.com; jloper@masseygail.com; jmassey@masseygail.com; Campbell, James M.; jnelson@susmangodfrey.com; joann.autry@murphyfalcon.com; O'Donnell, Jack J.; O'Neil, Joseph E.; jsawin@sawinlawyers.com; jstevenson@plunkettcooney.com; jude.hickland@faegredrinker.com; kaltman@lawampmmmt.com; karyn.slavin@murphyfalcon.com; kelly.friel@sadplaw.com; KettlerM@michigan.gov; kquinn@shrr.com; kjackson@shrr.com; kjames@goodmanhurwitz.com; kkilby@mcgrawmorris.com; klane@mcgrawmorris.com; klein@butzel.com; Kliffel@butzel.com; kpeaslee@susmangodfrey.com; kpierson@cohenmilstein.com; kpiper@owdpc.com; ksilverman@mayerbrown.com; kuhlr@michigan.gov; Laidlerlaw@hotmail.com; lalfano@fraserlawfirm.com; larry@tribelaw.com; larsen@butzel.com; lcuomo@cohenmilstein.com; lcushman@plunkettcooney.com; lharroff@fosterswift.com; lkrueger@cohenmilstein.com; lmandara@motleyrice.com; lmcpartin@clarkhill.com; lrobbins@plunkettcooney.com; lseale@goodmanhurwitz.com; lshi@mayerbrown.com; lwhitney@sfplaw.com; mail@goodmanhurwitz.com; manningp@michigan.gov; mbern@bernlip.com; mcaffee@aol.com; mchristian@mayerbrown.com; mcinneshp@aol.com; Melanie Daly; Fraser, Michelle; mgildner@sfplaw.com; mike@farrellfuller.com; mingber@mayerbrown.com; mitosinkaa@michigan.gov; mlmcalpine@mcaldpinepc.com; Moshe S. Maimon; mmitchell@maddinhauser.com; mnapoli@napolilaw.com; mnguyen-dang@mayerbrown.com; molsen@mayerbrown.com; mpitt@pittlawpc.com; mquirk@motleyrice.com; msinkovich@excololaw.com; Madeleine Skaller; Ter Molen, Mark; mturchyn@hertzschr.com; murdoch@butzel.com; mvikey@cohenmilstein.com; mwimmer@susmangodfrey.com; mwise@grsm.com; nick.szokoly@murphyfalcon.com; nlietzau@mcaldpinepc.com; npioch@littler.com; pcronk@plunkettcooney.com; PErickson@plunkettcooney.com; pgeske@mcgpc.com; pgrashoff@shrr.com; planciotti@napolilaw.com; plannen@plunkettcooney.com; pnovak@weitzlux.com; rbel@pittlawpc.com; RBrooks@blankrome.com; rmclaughlin@hmelegal.com; Campbell, Richard P.; sara.rahmjoo@murphyfalcon.com; sburke@burkepllc.com; segarslaw@hotmail.com; sfletcher@thefletcherlawfirmpllc.com; shansel@motleyrice.com; shart@hmelegal.com; graymond@susmangodfrey.com; smonroe@bernlip.com; solomon@radnerlawgroup.com; sradner@excololaw.com; SSmith@bdlaw.com; smorrissey@susmangodfrey.com; tbingman@tbingmanlaw.com; tbishop@mayerbrown.com; Timothy.Walthall@usdoj.gov; tleopold@cohenmilstein.com; tmcgraw@mcgrawmorris.com; tory.flinley@faegredrinker.com; tperkins@perkinslawgroup.net; Travis.Gamble@faegredrinker.com; trina@vwllegal.com; tsantinomateo@gmail.com; tweglarz@fiegenerlaw.com; val@vwllegal.com; vcooper@cityofflint.com; VBHATIA@susmangodfrey.com; vkuhl@shrr.com; wayne.mason@dbb.com; wayne.mason@faegredrinker.com; wkim@cityofflint.com; Zachary.bialick@sadplaw.com; zeinehlaw@gmail.com; Cohen, Jason T. (CIV); giordt@mayerbrown.com; Calica, Andrew; Flint; Scheduling

Subject: Re: Flint: Deposition of Warren Green - August 14, 2024
Date: Friday, June 28, 2024 8:33:57 AM
Attachments: [external.png](#)

 External email >

Alaina:

Please allow this communication to serve as an objection to the serving of this subpoena and the taking of this deposition on behalf of our firm's clients.

Mr. Green has already been deposed (on video) as a fact witness over the course of numerous depositions, and has testified at trial as a fact witness for approximately four days.

LAN's counsel has informed us that if this deposition goes forward, Mr. Green will again be

testifying as a fact witness.

Simply put, there is no need for more testimony from Mr. Green regarding facts he has spent significant time already testifying about.

Best,

Corey M. Stern
Levy Konigsberg, LLP
605 Third Avenue, 33rd Floor
New York, New York 10158
(212) 605-6200
cstern@levylaw.com
www.levylaw.com

On Jun 27, 2024, at 3:09 PM, Devine, Alaina N. <ADevine@campbell-trial-lawyers.com> wrote:

Counsel,

Consistent with Judge Levy's orders at the March 20, 2024 Status Conference, attached please find a notice of deposition and subpoena to Warren Green who will be deposed on **August 14, 2024** beginning 10 AM ET.

Consistent with the Fifth Amended Case Management Order, any party wishing to raise an objection or a scheduling conflict shall do so within three (3) business days.

Thank you,

Alaina N. Devine
Campbell Conroy & O'Neil
Professional Corporation

<image001.jpg>

20 City Square, Suite 300
Boston, MA 02129
Office: (617) 241-3037
Cell: (508) 612-6204
Email: adevine@campbell-trial-lawyers.com

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